# EXHIBIT G

## **Basilio Stewart**

### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:	18-cv-12337 (GBD)(SN)
Gaston, et al. v. Islamic Republic of Iran	ECF Case

#### **DECLARATION OF BASILIO STEWART**

- I, Basilio Stewart, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:
- 1. I am more than eighteen (18) years of age, and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
  - 2. I was a citizen of the United States on September 11, 2001, and I remain so today.
- 3. On September 11, 2001, I was present in New York City when the terrorist attacks on the World Trade Center (WTC) occurred.
- 4. On the morning of September 11, 2001, I was a Service Inspector employed by the Office of the Mayor of New York City. When the first plane struck the World Trade Center, I was preparing for work in the parking lot of 100 Church Street, only a few blocks away. My partner and I were assigned to work in Queens that day and were driving there as the attacks unfolded. We were on the Brooklyn Bridge when the second plane struck the World Trade Center, leading us to fear for the safety of colleagues who were still at the Church Street workplace, as well as for my wife who worked elsewhere in Manhattan.
- 5. After the attacks, travel through the city was difficult and I had no way to contact my wife or daughters, to know that they were safe, or for them to know that I was safe. I was unable to return home on Staten Island until late that night.

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- In my capacity as an employee of the Mayor's office, from September 12<sup>th</sup> to 6. September 14<sup>th</sup>, I was stationed in upper Manhattan to field and direct calls from citizens searching for information about the attacks and missing loved ones. In the subsequent days we were stationed at Pier 94 as well as 40 Worth Street and 253 Broadway, where we made ourselves available to address questions and concerns from the public. From September 17<sup>th</sup> to September 24<sup>th</sup> we returned to the office at 100 Church Street, in order to remove materials, papers, and other items from the building.
- 7. During this period, I would commute to and from my places of work via the ferry from Staten Island and walk on Broadway. It was during this time that I first noticed that I was coughing more frequently and my breathing was impacted. I ultimately began coughing blood, and lost sufficient weight that my coworkers noticed.
- 8. These problems persisted, and as a result of that exposure, I was diagnosed with Sarcoidosis in 2004. I continue to suffer from medical issues.
- 9. I continue to seek medical treatment for the injuries I suffered in the immediate aftermath of 9/11. My physical injuries and conditions were determined to make me eligible for compensation by the Victim Compensation Fund ("VCF"). A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this Declaration as part of this exhibit.

ALTY OF PERJURY that the foregoing is true and correct. day of

Declarant Basilio Stewart



September 20, 2013



#### Dear Basilio Stewart:

Your Eligibility Form for the September 11th Victim Compensation Fund (VCF) has been reviewed. You submitted an Eligibility Form for Personal Injury Claimants. Your claim number is VCF0004634.

#### The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute (the Zadroga Act and the original statute) and regulations¹ and therefore the VCF will review your Compensation Form and supporting materials to determine the amount of any award. Based on the information you submitted and information the VCF has received from the World Trade Center Health Program (WTCHP), you have been found eligible for the following injuries:

#### Sarcoidosis

Please note that there are several reasons why an injury that you think should be eligible is not listed above. First, for non-traumatic injuries, the description of the injury is based on the information provided by the WTCHP and there can be several alternative descriptions for the same injury. Additionally, a WTCHP physician may have provided testing or treatment for an injury even if the WTCHP has not certified that injury for treatment. Finally, your injury may not be listed if it was only recently certified for treatment by the WTCHP. The VCF regularly receives updated information from the WTCHP and will notify you if additional injuries have become eligible.

#### What Happens Next

The VCF will determine your compensation award based solely on the eligible injuries listed above. In order for the VCF to do so, you must submit the Compensation Form for Personal Injury Claimants and the required supporting documents. If you have not already done so, please submit the Compensation Form and the required supporting documents as soon as possible. You are encouraged to submit the Compensation Form through the VCF's web-based claim system at www.vcf.gov. If you wish to complete the Compensation Form in hardcopy, you may request the form by contacting the toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call

<sup>&</sup>lt;sup>1</sup> The statute (the Air Transportation Safety and System Stabilization Act as amended by the Zadroga Act) and the regulations are located at <a href="http://www.vcf.gov/lawRulesOtherDocs.html">http://www.vcf.gov/lawRulesOtherDocs.html</a>.



September 11th Victim Compensation Fund

1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-353-0356.

In addition to the Compensation Form, please also complete and submit the VCF ACH Payment Information Form. This form can be found on our website in Section 8 of the Frequently Asked Questions (FAQs). The completed form must be submitted before the VCF can arrange for any payment.

The VCF will be able to determine your compensation award based on the eligible conditions after all compensation related documents are submitted. When you receive an award letter, you will have the right to appeal. In that appeal, you have the right to assert additional injuries that you believe are eligible and for which you believe you should be compensated. For purposes of the statutory deadlines, the injuries listed in your claim form and the injuries certified as eligible will be deemed "filed". You will receive instructions on the appeal process when you receive the letter with details of your compensation award.

If you have questions about the information in this letter or the claims process in general, please contact our toll-free Helpline at the number noted above. Every effort will be made to respond to your inquiries as soon as possible.

Sincerely,

September 11th Victim Compensation Fund